

Responses to Comments in Letter 150 from Danielle Dixon, Northwest Energy Coalition

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the preceding comment letter.

1. Please see Letter 65, Response to Comment 1 for a discussion of greenhouse gases and potential mitigation measures related to the proposed project.
2. The proposed project would emit greenhouse gases but at a much lower rate than a similarly sized coal-fired plant. It is not known if the proposed project would directly displace an existing coal-fired facility. Over time as older, coal-fired facilities are phased out and replaced by newer, more efficient facilities, overall greenhouse gas emissions would be reduced.
3. The Oregon standard was enacted by the Oregon legislature after an extensive public policy review involving all stakeholders over a number of years. Washington State has not undergone any comparable process with respect to policy formation and legislation on the subject of greenhouse gas regulation. Consequently, there is no regulatory requirement to commit to specific CO₂ offset goals. Rather than basing a program on prospective performance of a carbon offset program, the applicant has proposed to provide funding in a known amount (\$100,000 per year for a 10-year period). It is possible that the funding proposed by the applicant, if it were applied to research, could lead to enhanced abilities to offset greenhouse gas emissions in magnitudes far exceeding the emissions of the proposed facility, depending upon the success of the project funded. (Exhibit 158, page 11). See also Letter 65, Response to Comment 1 for a discussion of greenhouse gas emissions related to the proposed facility. The Energy Facility Site Evaluation Council would decide ultimately what level of CO₂ mitigation would be required if the plant is sited.
4. The discussion concerning significant emissions from the proposed facility on page 3.1-10 of the Draft EIS is related to anticipated emissions of pollutants regulated under the Prevention of Significant Deterioration (PSD) Program. The minimum emission rate (in tons per year) which triggers a PSD review is referred to as the “significant emission rate”. Exceedance of these thresholds triggers a PSD review and analysis. The greenhouse gas section of the Draft EIS acknowledges that greenhouse gases are concentrating in the atmosphere and that the elevated concentration of such gases will potentially affect the earth’s climate.
5. Because methane is not a regulated pollutant, it was not included in the air quality impact analysis prepared for the project. To the extent that all greenhouse gases are reduced by the project, methane emissions would also be reduced.
6. The comments are noted.
7. See Letter 162, Response to Comment 1 for discussion regarding transmission grid impacts.

8. The air quality impact analysis assumed the oil-firing for up to 15 days per year in the event of gas shortages. As a result, the impact analysis represents a worst-case analysis. Under this worst-case analysis, the proposed project would not result in violations of applicable air quality standards. In addition, the applicant has agreed to further limit oil-firing to 10 days per year averaged over a 10-year period (Exhibit 154.6, page 2).

The purpose of using diesel as a backup fuel is to enhance project availability to the system. Eliminating diesel would require down-ramping the facility during times of natural gas curtailment. As a result, load demand that had been met by S2GF would need to be picked up by another generating resource.

9. The project proponent has not indicated which of the 23 permanent employees, if any, would be employees that are already on staff at the existing plant.
10. The \$11 million represents payroll expenditures in Whatcom County. Actual payroll, including fringe benefits and other labor overhead costs, is projected at \$30.6 million. The 645 worker-year estimate was calculated using the IMPLAN model which involves making assumptions. The projections resulting from the model were provided by the applicant; assumptions or other details were not provided to Jones & Stokes.
11. Thank you for your comment.
12. The sentence to which you are referring perhaps needs clarification. The authors of the DEIS meant that S2GF could optimize renewable resources and the conservation of natural resources. For example, S2GF could be operated while a hydro unit was taken offline or reduced in output to allow storage of water that could later be used to augment fish flows in a river/stream.
13. See Letter 150, Response to Comment 12 (above).